

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BLUEBECK HOLDINGS LTD.,

Plaintiff,

v.

SWN PRODUCTION COMPANY, LLC,
SOUTHWESTERN ENERGY
COMPANY, SWN ENERGY SERVICES
COMPANY, LLC, WILLIAM J. WAY,
CARL GIESLER, JR., CHRISTOPHER
W. LACY, JOHN KELLY, COLIN
O'BEIRNE and ROBERT T. MCINTOSH,

Defendants.

:
: CIVIL ACTION NO.
:
: 3:23-CV-02095
:

:
: JUDGE KAROLINE
: MEHALCHICK
:

MOTION OF DEFENDANTS TO TRANSFER VENUE

Defendants SWN Production Company, LLC (“SWN Production”), Southwestern Energy Company (“SEC”), and SWN Energy Services Company, LLC (“SWN”) (the “Corporate Defendants”) and Defendants William J. Way, Carl Giesler, Jr., Christopher W. Lacy, John Kelly, Colin O’Beirne, and Robert T. McIntosh (the “Individual Defendants”), (collectively, “Defendants”), pursuant to 28 U.S.C. § 1404(a), move this Court, in the alternative to the Defendants’ Motions to Dismiss Plaintiff’s Complaint, to transfer venue of this case from the United States District Court for the Middle District of Pennsylvania to the United States District Court for the Southern District of Texas. The grounds supporting this motion will

be set forth in the Defendants' supporting brief to be filed pursuant to Local Rule 7.5.

March 1, 2024

Respectfully Submitted,

/s/ Robert L. Byer

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/s/ Ronald L. Hicks

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SWN Energy Services Company, LLC*

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<i>Plaintiff,</i>	:	3:23-CV-02095
	:	
v.	:	
	:	JUDGE KAROLINE
	:	MEHALCHICK
SWN PRODUCTION COMPANY, LLC,	:	
SOUTHWESTERN ENERGY	:	
COMPANY, SWN ENERGY SERVICES	:	
COMPANY, LLC, WILLIAM J. WAY,	:	
CARL GIESLER, JR., CHRISTOPHER	:	
W. LACY, JOHN KELLY, COLIN	:	
O'BEIRNE and ROBERT T. MCINTOSH,	:	
<i>Defendants.</i>	:	

CERTIFICATE OF NON-CONCURRENCE

I, Christopher Casey, certify pursuant to Local Civil Rule 7.1 that counsel for Defendants sought concurrence in the foregoing Motion from counsel for Plaintiff. Counsel for Plaintiff responded that Plaintiff does not concur in the Motion.

March 1, 2024

/s/ Christopher Casey

CERTIFICATE OF SERVICE

I certify that on March 1, 2024, a copy of the foregoing was filed electronically through the Court's ECF System. Notice of this filing will be sent to all counsel of record and the parties may access this filing through the Court's ECF System.

/s/ Robert L. Byer